

**Thacher
Proffitt**

Thacher Proffitt & Wood LLP
Two World Financial Center
New York, NY 10281
212.912.7400

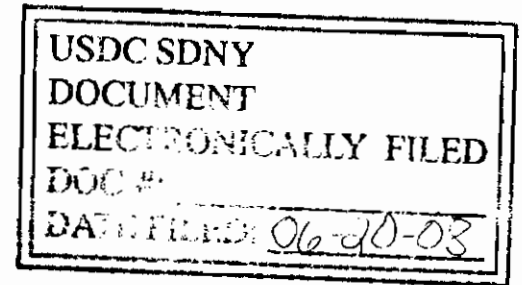
Fax: 212.912.7751
www.tpw.com

MEMO ENDORSED

June 2, 2008

BY HAND

Honorable Charles S. Haight
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1940
New York, New York 10007-1312



Re: *Northern Assurance Co. of Amer., et al. v. Lafarge N.A., Inc., et al.*
S.D.N.Y. Docket No.: 08 CV 03289 (CSH) (AJP)
Our File No.: 20239-00002

Dear Judge Haight:

We represent American Steamship Owners Mutual Protection and Indemnity Association, Inc. (the "Club") in the captioned matter. We have conferred with counsel for Northern Assurance Co. of America and American Home Assurance Co. (collectively, the "Following Excess Wharfinger's Liability Underwriters"), regarding the Club's Opposition to Following Excess Wharfinger's Liability Underwriters' Motion for Consolidation, as well as the Club's Cross-Motion to Stay the captioned matter pending resolution of the Club's declaratory judgment action against Lafarge North America, Inc. ("Lafarge").

The agreed-upon schedule is as follows:

- June 5, 2008: Due date for the Club's Opposition to Following Excess Wharfinger's Liability Underwriters' Motion for Consolidation, and for the Club's Cross-Motion to Stay;
- June 16, 2008: Due date for Following Excess Wharfinger's Liability Underwriters' Reply on their Motion for Consolidation;
- June 23, 2008: Due date for Following Excess Wharfinger's Liability Underwriters' Opposition to the Club's Cross-Motion to Stay; and

Honorable Charles S. Haight
June 2, 2008

Page 2

July 3, 2008: Due date for the Club's Reply on its Cross-Motion to Stay.

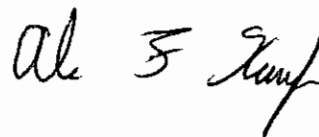
We also note our understanding that Lafarge has agreed to the same schedule with respect to its opposition papers and cross-motion.

Accordingly, we respectfully request that, as per Your Honor's individual rules, the Court endorse the agreed-upon schedule. We thank the Court for its consideration.

Respectfully submitted,

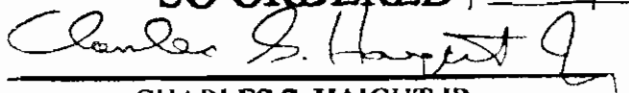
THACHER PROFFITT & WOOD LLP

By:



cc (via email): Robert G. Clyne, Esq.
John A.V. Nicoletti, Esq.

SO ORDERED, *nunc pro tunc*


CHARLES S. HAIGHT JR.
SENIOR UNITED STATES DISTRICT JUDGE

June 19, 2008